

EXHIBIT B

LOLA ALEXANDER

Condensed

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<p>1 EXAMINATION BY MS. SCAPICCHIO</p> <p>2 Q. Hi, Ms. Alexander, I'm Rose Scapicchio. I</p> <p>3 represent Shawn Drumgold. I have just a</p> <p>4 couple of questions.</p> <p>5 Since we took that five-minute</p> <p>6 break late in the afternoon, did you have an</p> <p>7 opportunity to review the affidavit with your</p> <p>8 signature on it and your testimony at the</p> <p>9 motion for a new trial which is about 56</p> <p>10 pages of testimony? Did you review that?</p> <p>11 A. Yeah, I looked at it, yeah.</p> <p>12 Q. You looked at it.</p> <p>13 Did you have enough time to review</p> <p>14 it?</p> <p>15 A. No, I didn't, no.</p> <p>16 Q. Okay. Did you want some more time to review</p> <p>17 that?</p> <p>18 A. I don't think it's necessary.</p> <p>19 Q. Okay. When you testified at the motion for</p> <p>20 new trial hearing, it's fair to say no one</p> <p>21 told you what to say, right?</p> <p>22 A. Right.</p> <p>23 Q. You answered the questions under oath to the</p> <p>24 best of your ability?</p>	<p>1 police -- when you said this in court in</p> <p>2 2003, that was true, right?</p> <p>3 A. Yes, it was.</p> <p>4 Q. Okay. And you remembered having a</p> <p>5 conversation with the police telling them</p> <p>6 about Mary's brain cancer, right?</p> <p>7 A. Yes.</p> <p>8 Q. And about her memory problems, right?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And then do you also remember</p> <p>11 testifying at the motion for new trial that</p> <p>12 not only had Mary been shown photographs at</p> <p>13 your house, but she had been brought to the</p> <p>14 police station and shown photographs?</p> <p>15 A. Yeah, I --</p> <p>16 Q. Okay.</p> <p>17 A. -- remember that, yeah.</p> <p>18 Q. And at some point in time, when the police</p> <p>19 came to your house, do you remember</p> <p>20 testifying that you'd asked them to stop</p> <p>21 coming by?</p> <p>22 A. I sure did.</p> <p>23 Q. Okay. And can you describe or do you recall</p> <p>24 describing for the Court back in 2003 what</p>
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<p>1 A. Yes.</p> <p>2 Q. And you told the truth when you were</p> <p>3 testifying under oath?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And when you were asked to explain to</p> <p>6 the Court what you told the officers about</p> <p>7 your daughter's health, do you remember</p> <p>8 telling the Court what you told the officers</p> <p>9 about your daughter's health?</p> <p>10 A. No, I don't remember that.</p> <p>11 Q. Do you remember ever telling the Court at</p> <p>12 page 15, I spoke with detectives as they came</p> <p>13 to my house numerous times, and I asked them</p> <p>14 not to harass my daughter, not to harass</p> <p>15 her, but not to keep coming by my house</p> <p>16 bothering my daughter because my daughter was</p> <p>17 real sick, and she don't remember things, and</p> <p>18 I said that put more pressure on my</p> <p>19 daughter's head to try to be aggravated with</p> <p>20 something that went on out on the street</p> <p>21 which she didn't know anything about (reading</p> <p>22 document)? Do you remember answering that --</p> <p>23 A. I remember saying that, yes, I do.</p> <p>24 Q. And that's true?</p>	<p>1 conditions Mary was suffering from, in other</p> <p>2 words, what her -- what her symptoms were of</p> <p>3 the brain cancer back in 2003 when you</p> <p>4 testified?</p> <p>5 That's a bad question let me try</p> <p>6 it again.</p> <p>7 Do you remember -- when the police</p> <p>8 officers were asking Mary questions about the</p> <p>9 Tiffany Moore murder, do you remember what</p> <p>10 her physical condition was back then?</p> <p>11 A. I -- I can't remember.</p> <p>12 Q. Okay. But you remember that she had some</p> <p>13 memory problems, is that right?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Can you give us any examples of her</p> <p>16 memory problems?</p> <p>17 A. Sometimes she couldn't even remember her</p> <p>18 phone number or she can put her purse down</p> <p>19 and don't remember where she put it, that</p> <p>20 quick or whatever, you know.</p> <p>21 Q. And was there an incident where she couldn't</p> <p>22 remember her son's name?</p> <p>23 MR. CURRAN: Objection.</p> <p>24 MR. ROACHE: Objection.</p>
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<p>1 A. Yes.</p> <p>2 Q. Okay. And do you remember me asking if you</p> <p>3 had any other discussions with the police</p> <p>4 officers regarding your daughter's memory and</p> <p>5 her ability to remember things? Do you</p> <p>6 remember me asking you that?</p> <p>7 A. Yeah.</p> <p>8 Q. Okay. And do you remember testifying under</p> <p>9 oath, then, that you said to them from the</p> <p>10 beginning that when they first started</p> <p>11 questioning my daughter that my daughter's</p> <p>12 memory wasn't good because she had malignant</p> <p>13 cancer of the brain and she didn't need any</p> <p>14 more pressure on her; she didn't remember</p> <p>15 from one day to the other or from one</p> <p>16 incident to the other that happened during</p> <p>17 the day (reading document)? Do you remember</p> <p>18 testifying to that?</p> <p>19 A. Yes.</p> <p>20 Q. Do you have a specific memory of telling the</p> <p>21 police officers that about Mary's condition?</p> <p>22 A. About -- rephrase that?</p> <p>23 Q. Sure.</p> <p>24 Do you remember telling the</p>	<p>1 MS. HARRIS: Objection.</p> <p>2 MR. WHITE: Objection.</p> <p>3 BY MS. SCAPICCHIO:</p> <p>4 Q. All right. Let me ask you this: Were there</p> <p>5 any occasions where her memory got</p> <p>6 significantly worse?</p> <p>7 A. I don't remember. I can't say.</p> <p>8 Q. Okay. Do you remember ever telling any</p> <p>9 investigator that there were occasions when</p> <p>10 Mary couldn't remember her own son's name?</p> <p>11 A. I think so, yeah.</p> <p>12 Q. Okay. So you remember saying that to an</p> <p>13 investigator?</p> <p>14 A. Yeah.</p> <p>15 Q. Okay. And --</p> <p>16 A. Yes.</p> <p>17 Q. And that concerned you quite a bit about</p> <p>18 Mary's memory loss; is that fair to say?</p> <p>19 A. Fair to say.</p> <p>20 Q. Okay. And you sort of -- well let me ask you</p> <p>21 this: While that was happening, did you try</p> <p>22 to protect Mary from further investigation by</p> <p>23 the police?</p> <p>24 A. No, I didn't.</p>

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1 Q. Okay. So you didn't do anything when they
2 came to your house to stop them from speaking
3 to her?
4 A. No, I don't remember. I don't remember.
5 Q. Okay.
6 A. I don't remember.
7 Q. All right. And other than the memory
8 problems, did you testify that she also had
9 headaches?
10 A. Yeah, she had severe headaches.
11 MR. CURRAN: Do you have a time
12 frame there?
13 MS. SCAPICCHIO: Okay.
14 MR. CURRAN: Time frame in regards
15 to, for one, all this was happening, I
16 mean --
17 MS. SCAPICCHIO: Well let me ask
18 it again.
19 BY MS. SCAPICCHIO:
20 Q. When did Mary first start having headaches,
21 do you remember?
22 A. I can't remember.
23 Q. Okay. Sometime after Tiffany Moore was
24 killed on August 19th of 1988, do you

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1 remember Mary having headaches at all?
2 MR. CURRAN: Again, time frame.
3 After until her death? I mean, when? I mean
4 that's one of the key and critical issues in
5 this case, so it's the memory of this witness
6 in regards to the time frame which is when
7 this is occurring.
8 MS. SCAPICCHIO: Right.
9 MR. CUARRAN: So you're saying
10 from X all the way to the present?
11 MS. SCAPICCHIO: I didn't say all
12 the way to the present.
13 MR. CURRAN: That's what's implied
14 by the question. If you just --
15 MR. ROACHE: Object to the form.
16 MR. CURRAN: -- narrow -- okay.
17 MS. SCAPICCHIO: Is there an
18 objection?
19 MR. CURRAN: Yeah, there's an
20 objection.
21 MR. ROACHE: Objection.
22 MS. SCAPICCHIO: All right.
23 BY MS. SCAPICCHIO:
24 Q. Let me ask you another question,

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1 Mrs. Alexander. Do you remember testifying
2 at the motion for new trial hearing in 2003
3 and explaining to the judge the problems that
4 Mary was having with headaches?
5 A. Yes, I remember that.
6 Q. Okay. And do you remember what you used to
7 do to assist her when she had those problems
8 with headaches?
9 MR. ROACHE: Objection.
10 BY MS. SCAPICCHIO:
11 Q. Go ahead, you can answer.
12 A. I used to sit and hold her head in my lap.
13 Q. Okay. And for how long a period of time
14 would you have to sit and hold her head in
15 your lap while she was having headaches?
16 A. It would be hours.
17 Q. So you indicated that sometimes you'd have to
18 hold Mary's head in your lap for hours while
19 she had headaches?
20 A. Yes.
21 Q. Okay. And would she have other symptoms when
22 she had headaches other than, you know, a
23 headache? Would there be any other physical
24 symptoms that she would --

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1 A. Not that I can remember. That's all I can
2 remember, those severe headaches.
3 Q. Okay. And for how long a period of time did
4 she have the severe headaches before she got
5 diagnosed with the brain cancer?
6 A. I can't remember that.
7 Q. Okay. Do you remember whether or not when
8 she had these headaches they were also
9 accompanied by some memory loss?
10 MR. ROACHE: Objection.
11 BY MS. SCAPICCHIO:
12 Q. You can answer.
13 A. Yes.
14 Q. Okay. And when you testified at the motion
15 for new trial hearing in 2003, do you
16 remember me asking you --
17 MS. SCAPICCHIO: This is page 12.
18 Q. -- and did you have any conversations with
19 Boston police detectives and specifically
20 Detective Murphy regarding your daughter's
21 treatment at these medical centers (reading
22 document)?
23 Do you remember being asked about
24 Mary's treatment at the medical centers at

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1 the motion for new trial hearing in 2003?
2 A. No, I don't remember.
3 Q. Do you remember answering back, then, that
4 you said that you told both detectives about
5 her being treated at the Boston Medical
6 Center and the Carney Hospital?
7 MR. ROACHE: Objection.
8 MR. CURRAN: Objection
9 MR. WHITE: Objection.
10 MS. HARRIS: Objection.
11 A. I don't remember.
12 Q. All right. I'm going to show you page 12 of
13 your testimony at the motion for new trial
14 hearing, and I'm going to ask you to read it
15 to yourself (handing document).
16 A. Well, I don't remember --
17 Q. No, no, just read it to yourself.
18 A. Read what? All of it?
19 Q. Yes.
20 A. (Reading document) I don't know. They
21 said --
22 Q. No, no, just to yourself, Mrs. Alexander.
23 A. Oh.
24 (Pause)

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1 Q. Did you have a chance to read page 12 of your
2 motion for new trial testimony?
3 A. (No response)
4 Q. On page --
5 A. Yes.
6 Q. Okay. Does it refresh your memory at all as
7 to whether or not you told the Court back in
8 2003 that you told both detectives about your
9 daughter's condition and treatment at these
10 medical centers?
11 A. That don't refresh my memory.
12 Q. It doesn't?
13 A. No.
14 Q. Okay. So when you testified in 2003, nobody
15 told you what to say about --
16 A. No.
17 Q. -- your daughter, right?
18 A. They didn't.
19 Q. Okay. And you testified under oath back
20 then, right?
21 A. Yes.
22 MR. CURRAN: Objection.
23 BY MS. SCAPICCHIO:
24 Q. And you had no reason to do anything other

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1 than tell the truth, is that right?
 2 A. Right.
 3 MR. WHITE: Objection.
 4 MS. SCAPICCHIO: I don't have any
 5 further questions.
 6 MR. CURRAN: Could we just have
 7 that marked as an exhibit, the transcript
 8 that you had her review and the other --
 9 MS. SCAPICCHIO: I think it
 10 already is. We did.
 11 MR. CURRAN: Oh, did we? Okay,
 12 sorry.
 13 MR. ROACHE: Mrs. Alexander, I
 14 have just a couple of questions. I know it's
 15 a long day, and I know you're tired as we all
 16 are. I will be brief.
 17 FURTHER EXAMINATION BY MR. ROACHE
 18 Q. Back in August of 1988 when you heard the
 19 shots that evening, who was in the house with
 20 you?
 21 A. No one.
 22 Q. Okay. And do you recall what time it was
 23 that you heard the shots?
 24 A. No, sir.

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1 Q. Okay. Now where was Carla that night?
 2 A. I don't know.
 3 Q. Was she living on Homestead Street with you?
 4 A. No, sir.
 5 Q. Okay. Where was Yolanda when the shots --
 6 when you heard the shots?
 7 A. I don't know.
 8 Q. Okay. Yolanda was born in February 1969, is
 9 that correct, February 20th, 1969?
 10 A. Yes, sir.
 11 Q. So Yolanda was 19 years of age at the time of
 12 the shooting of Tiffany Moore?
 13 A. If you say so.
 14 Q. Okay. Was Yolanda living with you on
 15 Homestead Street in 1988?
 16 A. No, sir.
 17 Q. Where was she living?
 18 A. I don't know.
 19 Q. How long had -- how long before the shooting
 20 did she stop living with you?
 21 A. Yolanda had not been living with me for a
 22 long time.
 23 Q. For a long time?
 24 A. Yes.

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1 Q. Okay.
 2 A. Yeah.
 3 Q. How old was Yolanda when she moved out of
 4 your home?
 5 A. I can't remember that.
 6 Q. Was she in high school?
 7 A. No, she wasn't.
 8 Q. Did she go to high school?
 9 A. Yes, she did.
 10 Q. What high school did she go to?
 11 A. Alabama.
 12 Q. Alabama?
 13 A. Yeah.
 14 Q. And was she living in Boston in 1988 when
 15 Tiffany Moore was shot?
 16 A. I can't remember that.
 17 Q. Okay. Now you said that Yolanda has two
 18 children?
 19 A. Now she does, yes, sir.
 20 Q. She has two children.
 21 And what are their names and ages?
 22 A. Jerry is 16, I think, 16. I think Jelaya --
 23 I think she's 10.
 24 Q. How do you spell Jelaya?

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1 A. J-E-L-A-Y-A.
 2 Q. And she's 10 years old?
 3 A. I think she's 10.
 4 Q. And Jerry, is that Gerald, Gerard or --
 5 A. Jerry, J-E-R-R-Y.
 6 Q. Okay. And Jerry is 16?
 7 A. I think he's 16.
 8 Q. And both Jerry and Jelaya live with Yolanda?
 9 A. Yes.
 10 Q. And does anyone else live currently with
 11 Yolanda?
 12 A. Not as I know of.
 13 Q. Okay. And where does Jerry attend school?
 14 A. I don't know.
 15 Q. When is the last time you saw Jerry?
 16 A. About month and a half ago.
 17 Q. And you don't know if he attends school?
 18 A. I don't know where he attends school at.
 19 Q. I asked you if he attends school.
 20 A. Yeah, he attends school.
 21 Q. But you don't know what school he attends?
 22 A. No, sir.
 23 Q. Okay. And Jelaya, what school does she
 24 attend?

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1 A. I don't know.
 2 Q. You don't know?
 3 A. No.
 4 Q. When's the last time you saw Jelaya?
 5 A. Same time I did Jerry, about a month, a month
 6 and a half ago.
 7 Q. About a month and a half ago, okay.
 8 Now Kenya back in 1988 was 13
 9 years of age. Where was he that night that
 10 Tiffany Moore was killed?
 11 A. I don't know if -- I told you before when you
 12 asked me that question, I think I might have
 13 sent them away because when summertime comes,
 14 I usually send the smaller ones out to go
 15 down South.
 16 Q. Yeah, but Kenya was 13 that year. Did you
 17 send him down South when he was 13?
 18 A. When I say -- yes, Kenya, Rico, and Jamarr.
 19 Q. Okay. What school was Kenya attending in
 20 1988 or '89?
 21 A. I don't know, but he was attending school. I
 22 don't know.
 23 Q. Do you know what grade he was in?
 24 A. No, I sure don't.

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1 Q. And he wasn't at home on August 19th, 1988,
 2 at the time you heard the shots?
 3 A. None of my little kids were there.
 4 Q. Okay. And Delrico in 19- -- on August 19th,
 5 1988, was nine years of age, is that correct?
 6 A. I don't know. If that's your figure. I
 7 can't think of -- you know, back there.
 8 Q. Okay. Well correct me if I'm wrong, but
 9 Delrico's date of birth was July 29th, 1979.
 10 A. Yes.
 11 Q. So in August of 1988, that would make him
 12 nine years of age?
 13 A. If you say so.
 14 Q. Okay. I think my math's pretty good.
 15 A. Mm-hmm, but mine sure ain't.
 16 Q. Okay. What school was Delrico attending in
 17 1988 or 1989?
 18 A. I don't know.
 19 Q. What grade was Delrico in in September of
 20 1989?
 21 A. I don't know.
 22 Q. What grade was Delrico in in September of
 23 1988?
 24 A. I don't know.